

REMARKS

In the above-identified Office Action objections were made, in paragraph 3, with regard to the form of Claims 19-21. By this Amendment, the changes suggested by the Examiner have been adopted. Further in this regard, the Examiner's statement in paragraph 8 of the Office Action is acknowledged, wherein it was stated that Claims 19-21 would be allowed upon entry of the corrections as set forth in the foregoing amendment. Applicants also acknowledge the statement in paragraph 6 of the Office Action, to the effect that Claims 24 and 27 would be allowable if rewritten in independent form. By means of the foregoing Amendment Claims 24 and 27 have now been presented in independent form.

In summary, Applicants respectfully submit that all of Claims 19-21, 24 and 27 are in condition for allowance.

In paragraph 5 of the Office Action, Claims 22, 23, 25 and 26 were rejected as being anticipated by the cited Karz patent. Referring first to the rejection of Claim 25, Applicants point out that that claim stresses the importance of the relative position between the heat generating member and the movable member, and stresses that those elements are provided on the substrate. That is, the cantilever type movable member is disposed to face the heat generating member with a specific gap therebetween, and both are provided on the substrate. In this manner, the growth of a bubble, generated by the heat generating member, is stably controlled so that liquid discharge can be stably and efficiently performed. Referring now to the Karz reference Applicants submit that Karz does not disclose the claimed structure wherein a movable member is disposed on the substrate in the manner set forth in Claim 25. Instead, Karz discloses that a layer is provided which serves as the movable member (valve 40), and that that layer is formed on a channel blade 31 in a liquid flow pattern constituting channel 20, as shown in Fig. 5.

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Applicants' claimed device provides an advantage over Karz, since that reference requires an alignment between the substrate and the channel plate 31, in order to line up the movable member and the heating element. Again, in Applicants' claimed invention, both of those elements are formed on the substrate. Accordingly, it is respectfully submitted that amended Claim 25 is patentable over the disclosure of Karz.

Similarly, Claim 22 has been amended to depend from allowable claim 25, wherefore Claim 22 and its dependent Claim 23 are believed to be allowable.

New method Claims 28 and 29 have been added, wherein those claims define a photolithographic method used in forming the substrate of Claim 25. Accordingly, it is believed that all of the claims as now presented are in condition for allowance and a formal Notice of Allowance is solicited.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,


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